Fill in this information to identify the case:

Debtor 1: Christopher M. Graney

Debtor 2 (Spouse, if filing): ______

United States Bankruptcy Court for the: EASTERN District of Pennsylvania (State)

Case number: 20-11233-amc

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Citizens Bank, N.A.

Court claim no. (if known): 2

Last 4 digits of any number you use to identify the debtor's account: 7642

Property address: 218 Pine Ridge Road
Number Street

______

Havertown, Pennsylvania 19083
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: $ ______

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 5 / 1 / 2025 (MM / DD / YYYY)

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) $ ______

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) $ ______

c. **Total**. Add lines a and b. (c) $ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: ____/____/______ (MM / DD / YYYY)

Debtor 1 Christopher M. Graney
First Name Middle Name Last Name

Case number (*if known*) 20-11233-amc

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

✘ /s/ Andrew M. Lubin
Signature

Date 04/21/25

Print Andrew M. Lubin
First Name Middle Name Last Name

Title Attorney for creditor

Company McCabe, Weisberg & Conway,LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 1420 Walnut Street, Suite 1501
Number Street

Philadelphia, PA 19102
City State ZIP Code

Contact phone (215) 790 – 1010

Email ecfmail@mwc-law.com

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Christopher M. Graney Debtor(s) Citizens Bank, N.A., or its Successor or Assignee Movant vs. SCOTT F. WATERMAN (Chapter 13), Trustee Christopher M. Graney Respondent(s)	Chapter 13 Bankruptcy No. 20-11233-amc

CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT

I, Andrew M. Lubin, attorney for Citizens Bank, N.A., hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 04/21/25

Christopher M. Graney
218 Pine Ridge Road
Havertown, Pennsylvania
19083

MICHAEL A. CIBIK
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
Attorney for Debtor

SCOTT F. WATERMAN
(Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, Pennsylvania 19606
Trustee

Office of the U.S. Trustee
Robert N.C. Nix Federal
Building
Suite 320
Philadelphia, PA 19107

/s/ Andrew M. Lubin
MARISA MYERS COHEN, ESQUIRE ID #87830
ANDREW M. LUBIN, ESQUIRE ID # 54297
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